

EXHIBIT 19

Samantha Wolff

From: Tiffany L. Bacon <tbacon@bremerwhyte.com>
Sent: Wednesday, July 12, 2017 12:00 PM
To: Samantha Wolff; Kurt A. Franklin; Lisa M. Pooley; vic@ottenlawpc.com
Cc: Tiffany L. Bacon; Alison Hurley
Subject: Spencer, et al. v. Lunada Bay Boys, et al. - L.R. 7-3

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Hi Samantha,

I am following up on our call pursuant to Local Rule 7-3 regarding Defendant Frank Ferrara's and Defendant Charlie Ferrara's intent to file motions for summary judgment in this matter. As I stated during our call, it is clear from the evidence in this case to date and all depositions taken in this matter, including the recent depositions of our clients, that Plaintiffs have no affirmative evidence to support their claims against Defendants Frank Ferrara and Charlie Ferrara. Based thereon, we demand that Frank Ferrara and Charlie Ferrara be dismissed from the action.

You indicated that Plaintiffs are not willing to dismiss Frank Ferrara or Charlie Ferrara from any claims in this action at this time, with the exception of potentially dismissing the negligence claim. I request that you please confer with your colleagues and your clients regarding our request for dismissal of Frank Ferrara and Charlie Ferrara from this action and confirm by the close of business **tomorrow, July 13th**, which claims Plaintiffs are willing or unwilling to dismiss against Frank Ferrara and Charlie Ferrara.

Should you want to further discuss, please feel free to give me a call.

Thank you,

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